

1 Matthew I. Knepper, Esq.
2 Nevada Bar No. 12796
3 Miles N. Clark, Esq.
4 Nevada Bar No. 13848
5 Shaina R. Plaksin, Esq.
6 Nevada Bar No. 13935
7 KNEPPER & CLARK LLC
8 10040 W. Cheyenne Ave., Suite 170-109
9 Las Vegas, NV 89129
Phone: (702) 825-6060
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com
Email: shaina.plaksin@knepperclark.com

10 David H. Krieger, Esq.
11 Nevada Bar No. 9086
12 HAINES & KRIEGER, LLC
13 8985 S. Eastern Ave., Suite 350
14 Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

JAMES HITCHCOCK,
Plaintiff

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; EQUIFAX INFORMATION SERVICES
LLC; and NATIONSTAR MORTGAGE LLC,

Defendants.

Case No.: 2:18-cv-01653-APG-NJK

**JOINT MOTION TO EXTEND TIME TO
FILE STIPULATION OF DISMISSAL OF
EXPERIAN INFORMATION
SOLUTIONS, INC.**

[SECOND REQUEST]

JOINT MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL OF EXPERIAN INFORMATION SOLUTIONS, INC. [SECOND REQUEST] - 1

1 Plaintiff, James Hitchcock (“Plaintiff”) and Defendant Experian Information Solutions, Inc.
2 (“Experian”) (collectively, the “Parties”), by and through their counsel of record, hereby move
3 jointly to extend their deadline to file a Stipulation of Dismissal of Experian (45) forty-five days:
4

- 5 1. The Parties settled this matter on January 29, 2019.
- 6 2. Over the past few months, the Parties have been fine-tuning the language of the
7 Settlement Agreement, as well as addressing other issues surrounding the
8 settlement. However, all outstanding issues have been resolved.
- 9 3. The Parties have finalized the language in the Settlement Agreement.
- 10 4. The Parties request an extension of forty-five days to file their Stipulation of Dismissal
11 of Experian to allow the Parties additional time to finish finalizing and to execute the
12 Settlement Agreement.

14
15
16
17
18
19
20
21
22
23
24 / / /
25
26
27 JOINT MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL OF EXPERIAN
INFORMATION SOLUTIONS, INC. [SECOND REQUEST] - 2
28 C:\Users\JP014036\Desktop\James Hitchcock Second Joint Motion Regarding Dismissal of Experian Experian Edits 5.10.19 (SP) (002) (KN)
(002).docx

5. Plaintiff agrees to file the Stipulation of Dismissal of Experian no later than **June 24, 2019.**

DATED May 10, 2019.

<p>KNEPPER & CLARK LLC</p> <hr/> <p>/s/ <i>Shaina R. Plaksin</i></p> <p>Matthew I. Knepper, Esq. Nevada Bar No. 12796 Miles N. Clark, Esq. Nevada Bar No. 13848 Shaina R. Plaksin, Esq. Nevada Bar No. 13935 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com Email: shaina.plaksin@knepperclark.com</p> <p>HAINES & KRIEGER</p> <p>David H. Krieger, Esq. Nevada Bar No. 9086 8985 S. Eastern Avenue, Suite 350 Henderson, NV 89123 dkrieger@hainesandkrieger.com <i>Counsel for Plaintiff</i></p>	<p>NAYLOR & BRASTER</p> <hr/> <p>/s/ <i>Andrew J. Sharples</i></p> <p>Jennifer L. Braster, Esq. Nevada Bar No. 9982 Andrew J. Sharples, Esq. Nevada Bar No. 12866 1050 Indigo Drive, Suite 200 Las Vegas, NV 89145 Email: jbraster@nblawnv.com Email: asharples@nblawnv.com</p> <p>JONES DAY</p> <p>Katherine A. Neben, Esq. 3161 Michelson Drive Irvine, CA 92612 Email: kneben@jonesday.com</p> <p><i>Counsel for Defendant</i> <i>Experian Information Solutions, Inc.</i></p>
--	---

ORDER GRANTING

**EXTENSION OF TIME FOR PARTIES TO FILE STIPULATION OF DISMISSAL OF
EXPERIAN INFORMATION SOLUTIONS, INC.**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED this 13 day of May 2019.

JOINT MOTION TO EXTEND TIME TO FILE STIPULATION OF DISMISSAL OF EXPERIAN INFORMATION SOLUTIONS, INC. [SECOND REQUEST] - 3